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REMARKS

Claims 1-45 are currently pending in the present application and are presently under consideration. A clean version of all pending claims is found at pages 2-12. Favorable reconsideration is requested in view of the comments herein.

I. Rejection of Claims 16, 23, 30, 32-35, 37, 38, 41, 42, 43, and 45 under 35 U.S.C. §102(b)

Claims 16, 23, 30, 32-35, 37, 38, 41, 42, 43, and 45 stand rejected under 35 U.S.C. §102(b) as being anticipated by Oppenheim (US 5,734,905). Reconsideration and allowance of these is respectfully requested for at least the following reasons. Oppenheim does not teach or suggest each and every feature of applicants' invention as recited in the subject claims.

For a prior art reference to anticipate, 35 U.S.C. §102 requires that "each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (quoting *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

Regarding independent claims 16, 32, and 42, Oppenheim does not disclose a *function object* utilized to ...*create a mapping... between a source object and a target object* as recited in these claims. The present invention facilitates constructing a mapping between two object types associated with disparate schemas without requiring an ordinary user to have extensive knowledge in computer programming. Thus, data organized, packaged, and formatted in accordance with one particular schema used by an object (e.g., a schema employed by a particular business or group) can be mapped to an object utilizing a different schema (e.g., a schema utilized by a disparate business or group). The claimed *function object* is defined in the specification as an "elemental unit of transformation... that advantageously raises the level of a function call to an object, thereby rendering the function call a primary citizen of an object-oriented language." See page 4, lines 5-8. The present invention, therefore, facilitates transfer of data across

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business boundaries without requiring businesses to utilize identical schemas in organizing and packaging such data (*e.g.*, a *mapping* between documents/objects can be created). A *mapping* between a *source object* with a first schema and a *target object* with a second schema is created *via* associating a *source object node* with a *target object node* via the *function object*. See Fig. 2, page 13, lines 7-17.

In contrast, Oppenheim teaches transforming an object into a disparate object utilizing a pre-defined mapping. The Examiner concedes that such is an embodiment of Oppenheim, and accordingly cites a second embodiment disclosed in Oppenheim that facilitates transfer of data between three separate *application programs*. "The present invention also provides a mechanism for linking two or more unrelated *application programs* together in an ongoing manner, thereby allowing the output of one *application program* to automatically flow into another *application program* as its input." See col. 1, lines 22-26. The application programs disclosed in Oppenheim are an A/D converter, Signal Processor, and a Filter, wherein a continuous flow of data is being delivered from the A/D converter to the signal processor, and from the signal processor to the filter. See Fig. 8. Oppenheim, however, discloses that such an embodiment is utilized when disparate applications perform particular operations more desirably than others. "One application program might be best for changing the key in which the score or a portion of the score is written, while a second application program might be best for modifying the rhythm of the score or for adding special sound effects, and a third application might be best for filtering the score (or a corresponding sound file) with a specified function in either the time or frequency domains." See col. 1, lines 46-52. As the *application programs* disclosed in Oppenheim are designed for a particular task and can act standing alone, they cannot be "an elemental unit of transformation", the definition of the *function object* as recited in the subject claims.

Moreover, regarding claims 16, 32, 42, and 44, Oppenheim does not disclose, teach, or suggest *associating a source object node with an input* and *associating a target object node with the output* as recited in the subject claims. At most, Oppenheim discloses linking three different application programs to allow data to flow from a first application program to a second application program, and from the second application program to a third application program. Oppenheim does not teach or suggest such

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application programs comprising nodes, but rather illustrates that the application programs include an input and an output. *Nodes*, however, are illustrated in connection with the subject invention as structural components of particular schemas employed in objects. See Fig. 2. As Oppenheim teaches the transformation of data *via* disparate program applications that do not include *nodes* as recited in these claims, Oppenheim cannot anticipate such claims.

Regarding independent claims 33 and 41, as Oppenheim does not disclose a *function object* employed to create a mapping between a *source object* and a *target object*, Oppenheim cannot disclose a system and method for creating a *function object*. Further regarding claims 33 and 41, as well as independent claims 43 and 45, Oppenheim does not disclose *creating a script component having computer-executable instructions for performing a function using the user interface* in connection with *creating a graphical component associated with the function and having an input and an output* as recited in these claims. Oppenheim discloses enabling "creating an object containing an appropriate mathematical function" in connection with generating a transformer object. See col. 7, lines 1-5. However, the transformer object of Oppenheim does not have an input and an output. Rather, the transformer object is "slapped" onto a transformee object, which creates an entirely new object. However, such transformer object does not include *an input and output*. Oppenheim later discloses *application programs* that have an input and an output, but *creation* of such *application programs* is not disclosed. Furthermore, Oppenheim does not teach or suggest *associating the script component, the graphical component, and the interface component*, wherein *the interface component is adapted to provide the script component to a compiler in the mapping tool and to provide the graphical component to the graphical user interface*. creating a *script component for performing a function*. Such language in these claims refers to creation of a function object, and as Oppenheim does disclose such function object, Oppenheim cannot disclose creating a function object.

In view of at least the above, it is readily apparent that Oppenheim does not anticipate or make obvious independent claims 16, 32, 33, 41, 42, 43, and 45, and claims 23, 30, 34, 35, 37, and 38, which depend therefrom.

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II. Rejection of Claims 1-15, 17-22, 24-27, and 44 under 35 U.S.C. §103(a)

Claims 1-15, 17-22, 24-27, and 44 are rejected under 35 U.S.C. §103(a) as being unpatentable over Oppenheim and Microsoft's "Component Object Model Specification" (COM Specification). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Neither Oppenheim nor Microsoft's COM specification alone or in combination teach or suggest all the claim limitations of the subject invention.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j).

Regarding independent claims 1, 16 and 44, as discussed *supra*, Oppenheim does not teach or suggest a *function object* utilized to facilitate creation of a mapping between two objects, let alone particular components of the *function object*.

Microsoft's COM specification fails to make up for the deficiencies of Oppenheim *vis a vis* applicants' claimed invention, and therefore the subject rejection should be withdrawn.

09/662,399MS147164.1**III. Rejection of Claims 28, 29, and 31 under 35 U.S.C. §103(a)**

Claims 28, 29, and 31 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Oppenheim in view of Jordan (US 5,778,227). Reconsideration and allowance of these claims is respectfully requested for at least the following reasons. Jordan does not make up for the aforementioned deficiencies of Oppenheim regarding independent claim 16.

As claim 16 is believed to be in condition for allowance, the rejection of the subject dependent claims is moot. It is respectfully requested that this rejection be withdrawn.

IV. Rejection of Claims 36, 39, and 40 under 35 U.S.C. §103(a)

Claims 36, 39, and 40 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Oppenheim, and also over Faustini (US 6,496,870). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons.

Faustini does not make up for the aforementioned deficiencies of Oppenheim regarding independent claim 33, rendering the subject rejection moot. Withdraw of the rejection is therefore respectfully requested.

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V. Conclusion

The present application is believed to be condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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